

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

REBECCA BROWN, AUGUST TERRENCE
ROLIN, STACY JONES-NASR, and
MATTHEW BERGER on behalf of themselves
and all others similarly situated,

Plaintiffs,

V.

CASE NO. 2:20-cv-00064-MJH-KT

TRANSPORTATION SECURITY
ADMINISTRATION; DAVID P. PEKOSKE,
Administrator, Transportation Security
Administration, in his official capacity; DRUG
ENFORCEMENT ADMINISTRATION;
ANNE MILGRAM, Administrator, Drug
Enforcement Administration, in her official
Capacity; and UNITED STATES OF AMERICA,

Defendants.

JOINT MOTION TO EXTEND TIME TO FILE STATUS REPORT

Plaintiffs Rebecca Brown, Stacy Jones-Nasr, and Matthew Berger (“Plaintiffs”) and defendants Transportation Security Agency (“TSA”), TSA Administrator David P. Pekoske, the Drug Enforcement Administration (“DEA”), DEA Administrator Anne Milgram, and the United States of America (together, the “Government Defendants”) jointly move for a 23-day extension of time, from April 15, 2024 to May 8, 2024, to file a joint status report proposing a schedule for further proceedings in this case.

1. On April 1, 2024, the Court ordered the parties to “file a Joint Status Report no later than April 15, 2024, and . . . include the parties’ proposal for moving forward, additional court intervention if needed and proposed deadlines.” ECF No. 123.

2. Since the Court issued its April 1 order, the parties have been conferring regarding proposed next steps and scheduling matters.

3. However, due to the press of business in other matters, including an ongoing trial litigated by Plaintiffs’ counsel that is lasting longer than expected, the parties require additional time to complete their discussions and draft and finalize their joint status report.

4. For these reasons, the parties respectfully request that the deadline to submit their joint status report be extended by 23 days, from April 15 to May 8, 2024.

Dated: April 12, 2024

Respectfully submitted,

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*Admitted *Pro Hac Vice*